



**RUPPERT**  
**LANDSCAPE**

September 12, 2022

The Honorable Gabe Albornoz, President  
Montgomery County Council  
100 Maryland Avenue  
Rockville, MD 20850

Re: Bill 18-22, Noise Control - Leaf Removal Equipment - Amendments

Dear Council President Albornoz,

As a commercial landscape company operating in Montgomery County for 50 years, we (Ruppert Landscape) would like to provide the following written testimony regarding Bill 18-22, Noise Control - Leaf Removal Equipment – Amendments.

We understand the County's concern with addressing the noise created by gas-powered leaf blowers, but we feel that this bill will put an undue hardship on commercial landscape companies, our customers, and on county residents—who will be absorbing the costs associated with this bill. We estimate costs to purchase and operate battery powered blowers to be 5x's that of gas-powered models—a calculation that includes an additional 3-7 batteries (and chargers) needed for each unit to operate for an entire day (*see chart below*). In addition, creating the infrastructure at our facilities to ensure that we have the requisite load capacity, upfitting our trailers, and creating power stations that our trailers can connect to each night we estimate will cost around \$120,000 for our facility in Montgomery County.

Unlike a homeowner that uses an electric powered leaf blower for less than an hour once a week, we operate commercially using equipment daily, under rigorous conditions and over long durations. Electric leaf blowers do not provide the same amount of power and run time that gas powered blowers do. We estimate that it takes 35% more time to do the same amount of work when using battery powered vs. gas. Additionally, the need for frequent battery changes reduces the productivity and efficiency of our crews at a time when our industry (and many other service industries) is already faced with labor shortages.

Additionally, the production and disposal of these lithium-ion batteries, involves significant environmental impact. There are currently no great recycling programs with manufacturers, so this will all add additional burden to county resources in terms of disposal.

We believe that the technology and needed infrastructure just isn't here at this point to facilitate this move to battery powered equipment in our industry. If enacted, we will be passing along the added costs we incur to our customers in the form of rate increases; and county residents will be carrying the burden of the \$1.5M price tag at a time when we are experiencing a national inflation rate of over 9 percent. We believe this added burden on consumers and county residents is not well timed.

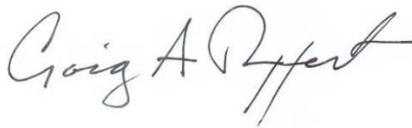
While we are always looking to invest in new technologies to improve efficiency and remain environmentally sound, we don't believe that this bill helps the environment, our community, or

our taxpayers. We share your concerns about protecting the health of our employees. Their safety is always our top priority, which is why we supply and mandate use of ear protection and provide instruction on how to properly use equipment and personal protective equipment. Perhaps an education program on how to protect operators' hearing when using gas powered blowers would be a better first step for the citizens of our county.

Where we could use help is having the council focus on improving county infrastructure and helping us maintain a competitive, resilient, and sustainable economy where businesses want to operate, and residents want to live.

With these concerns, we ask the council for an unfavorable vote on Bill 18-22, Noise Control - Leaf Removal Equipment – Amendments.

We thank you for your consideration,

A handwritten signature in black ink that reads "Craig A. Ruppert". The signature is written in a cursive style with a large, stylized initial "C".

Craig Ruppert  
CEO Ruppert Landscape

CC: Montgomery County Executive  
Montgomery County Council

**Ruppert's estimated yearly cost comparison: battery vs. gas powered blowers**

	Battery powered	Gas powered
<b>Blower</b>	\$670 (*includes battery)	\$500
<b>Charger</b>	\$160	
<b>3 Add'l batteries/chargers (spring/summer usage)</b>	\$1800	
<b>4 add'l batteries/chargers for fall leaf removal</b>	\$2400	
<b>Fuel/power charges</b>	\$150	\$600 (150 gal. @ \$4/gallon)
<b>TOTAL</b>	<b>\$5180</b>	<b>\$1100</b>

**Additional Considerations for County's Table 2 / Implementation Costs**

Item	Expected Cost	Details
<b>Education and Outreach</b>		
Mailers	\$240,000	Based on costs from mailers from the pesticide ban, to every resident and business in the County. This would be for two mailers. Reducing to one mailer saves \$120,000 or one full mailer with an additional just to single family homes would save \$57,000.
Advertisements	\$300,000	Radio, television, and internet ad campaigns, based on costs from implementing the pesticide ban.
<b>Subtotal</b>	<b>\$540,000</b>	
<b>Equipment Replacement</b>		
DGS Replacements	\$14,000	Equipment replacements for Department of General Services (DGS), including gasoline handheld, backpack, and walk behind blowers.
DOT Replacements	\$28,000	Equipment replacements for Department of Transportation (DOT), including gasoline handheld, backpack, and walk behind blowers.
Year 5+ DOT and DGS Battery Replacements	\$7,500	Batteries require replacements after enough use, expected in year five (5) or six (6) for many pieces of equipment.
<b>Subtotal</b>	<b>\$49,500</b>	
<b>Non-County Equipment Replacement - These are State entities that the County cannot enforce the legislation for, but may still want to support in replacing equipment.</b>		
MNCPPC Replacements	\$473,710	The Bill isn't enforceable to MNCPPC but is recommended for MNCPPC to replace equipment if possible.
MNCPPC Year 5+ Battery Replacements	\$66,750	The Bill isn't enforceable to MNCPPC but if MNCPPC is able to replace equipment, battery replacements are needed as well.
MCPS Replacements	\$1,298,336	The Bill isn't enforceable to MCPS but is recommended for MCPS to replace equipment if possible.
MCPS Year 5+ Battery Replacements	\$174,000	The Bill isn't enforceable to MCPS but if MCPS is able to replace equipment, battery replacements are needed as well.
<b>Subtotal</b>	<b>\$2,012,796</b>	
<b>Contractual Changes</b>		
DGS Contract Increases	\$90,000	DGS notes that County contracts for lawn care and landscaping are unpredictable, due to the complexity of required replacements and operational savings, but this estimate accounts for doubling the leaf management cost portion of its contracts due to the cost of equipment switching incurred to contractors.
<b>Transition Grants</b>		
Equipment Turn-in Rebates/Grants for Individuals and Small Businesses	\$300,000	Three-year program offering \$100 rebates for 1,000 applicants per year. The legislation gives DEP the authority for grants, but it is not a requirement. Prohibiting use of equipment still in useful life without offering a grant or rebate is not recommended.
Grant Management Software	\$10,000	Software to manage turn-in rebates/grants (first year cost only)
<b>Subtotal</b>	<b>\$310,000</b>	
<b>Personnel Costs</b>		
Grant Management	\$225,000	Term-limited staff member for 3 years. Alternatively, if the Septic legislation is approved and a position added for that workload, that position can handle these responsibilities.
<b>Operational Cost Avoidance</b>		
Operational Cost Avoidance	(\$1,737,750)	Assuming an average of \$350 in cost avoidance per piece of equipment per year for fuel and maintenance.
<b>Total</b>	<b>\$1,489,546</b>	

Equipment will need to be replaced more frequently; equipment purchased now will be obsolete in 3 years due to advances in technology; no provisions made for theft or breakage

No provisions for reduced productivity and additional labor hours to perform the work; leaf removal constitutes only 25-30% of blower use, likely increasing \$90K estimate to 3x's that.